Mr. Robert Thompson
D & D Brake Sales, Inc.
P.O. Box 160
Fortville, Indiana 46040

Re: **059-12475-00012**
First Minor Source Modification to
Part 70 No.: T059-9982-00012

Dear Mr. Thompson:

D & D Brake Sales, Inc. was issued a Part 70 Permit on June 26, 2000 for a brake shoe manufacturing facility. A letter requesting changes to this permit was received on July 10, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a minor source modification to this permit is hereby approved as described in the attached Technical Support Document.

This minor source modification corrects the unit description to state that there are three, not one, deliner choppers each with a maximum capacity of 1,875 brake shoes per hour, exhausting to baghouse #3. All three deliner choppers were installed at the source in 1992. The emission calculations were based on the outlet grain loading for baghouse #3 and will not be changed by this modification.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Phillip Ritz, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for extension (3-6878), or dial (973) 575-2555, extension 3241.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PR/EVP
cc: File - Hancock County
U.S. EPA, Region V
Hancock County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

D & D Brake Sales, Inc.
State Road 234 and Mohawk Road
Fortville, Indiana 46040

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T059-9982-00012	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 26, 2000

First Minor Source Modification: 059-12475-00012	Pages Affected: 5, 30, 31, 32, 33, 34, 35, 36 and 37
Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary brake shoe manufacturing facility.

Responsible Official:	Robert Thompson
Source Address:	State Road 234 and Mohawk Road, Fortville, Indiana 46040
Mailing Address:	P.O. Box 160, Fortville, Indiana 46040
Phone Number:	(317) 485-5177
SIC Code:	3069, 7539
County Location:	Hancock
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Two (2) Pangborn shot blasting systems, identified as #1 and 2, each constructed in 1992, each with a maximum capacity of blasting 700 pounds of brake shoes per hour, both utilizing one (1) baghouse (ID #1) for particulate control, exhausting through one (1) stack ID # 1;

(b) Four (4) grinders, identified as # 1, 2, 3, and 4, each constructed in 1992, each with a maximum grinding rate of 350 pounds per hour, all utilizing one (1) baghouse (ID #2) and a HEPA filter for particulate control, exhausting through one (1) stack ID #2;

(c) Three (3) deliner choppers, constructed in 1992, each with a maximum throughput capacity of 1,875 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3;

(d) Two (2) dip tanks, identified as primary and secondary, each constructed in 1992, each with a maximum throughput rate of 1.929 gallons per hour. The secondary dip tank is only used when the primary dip tank is not working; and

(e) One (1) propane storage tank, identified as #1, constructed in 1992, with a maximum storage capacity of 15,042 gallons.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1 (21) that do not have applicable requirements.

(a) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million British thermal units (MMBtu) per hour:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) Two (2) Pangborn shot blasting systems, identified as #1 and 2, each constructed in 1992, each with a maximum capacity of blasting 700 pounds of brake shoes per hour, both utilizing one (1) baghouse (ID #1) for particulate control, exhausting through one (1) stack ID # 1;

(b) Four (4) grinders, identified as # 1, 2, 3, and 4, each constructed in 1992, each with a maximum grinding rate of 350 pounds per hour, all utilizing one (1) baghouse (ID #2) and a HEPA filter for particulate control, exhausting through one (1) stack ID #2;

(c) Three (3) deliner choppers, constructed in 1992, each with a maximum throughput capacity of 1,875 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3;

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the two (2) Pangborn shot blasting systems shall not exceed 3.23 pounds per hour when operating at a combined process weight rate of 1,400 pounds per hour.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the four (4) grinders shall not exceed 3.23 pounds per hour when operating at a combined process weight rate of 1,400 pounds per hour.

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each of the three (3) deliner choppers shall not exceed 3.93 pounds per hour when operating at a process weight rate of 1,875 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(d) The requirement from CP-059-2477-00012, issued on August 26, 1992, Operating Condition #4, that establishes that particulate matter (PM) emissions shall be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 20% opacity is not applicable because facilities that discharge asbestos have opacity limitation standards pursuant to 326 IAC 14-2-1, (40 CFR 61.140, Subpart M).

(e) The requirement from CP-059-2668-00012, issued on October 21, 1992, Operating Condition #5, that establishes that particulate matter (PM) emissions shall be limited to 0.015 grains per actual cubic feet (gr/acf) at the outlet of the fan discharge for the dust collectors for the grinding and the shotblasting operations and that PM emissions will be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 10% opacity is not applicable. The allowable PM emission rate has been established pursuant to 326 IAC 6-3-2 (Process Operations) and facilities that discharge asbestos have opacity limitation standards pursuant to 326 IAC 14-2-1, (40 CFR 61.140, Subpart M).

D.2.2 National Emission Standards for Asbestos [326 IAC 14-2-1] [40 CFR 61.140]

The following requirements of this subpart shall be met for those facilities that discharge asbestos:

(a) Each owner or operator shall discharge no visible emissions to the outside air from these operations or from any building or structure in which they are conducted.

(b) Monitoring each potential source of asbestos emissions from visible emissions at least once a day.

(c) Inspecting each air cleaning device at least once each week for proper operation.

(d) Maintaining records of monitoring and inspections using a format similar to Figure 1 and 2 in 40 CFR 61.142, Subpart M.

(e) Furnishing upon request and/or making available the records for inspection by OAM.

(f) Retaining a copy of all monitoring and inspection records for at least two years.

(g) Submitting a copy of the monitoring records if visible emissions occurred during the report period.

(h) Meeting the waste disposal requirements.

40 CFR 61.150 (Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations)
Each owner or operator of any source covered under the provisions of 40 CFR 61.144, 40 CFR 61.145, 40 CFR 61.146, and 40 CFR 61.147 shall comply with the following provisions:

(1) Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by the source, or use one of the emission control and waste treatment methods specified in paragraphs (1) (i) through (iv) of this section.

(i) Adequately wet asbestos-containing waste material as follows:

(A) Mix control device asbestos waste to form a slurry; adequately wet other asbestos-containing waste material; and

(B) Discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations, or use the methods specified by 40 CFR 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air; and

(C) After wetting, seal all asbestos-containing waste material in leak-tight containers while wet; or, for materials that will not fit into containers without additional breaking, put materials into leak-tight wrapping; and

(D) Label the containers or wrapped materials specified in paragraph (a)(1)(iii) of this section using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(2) or 1926.58(k)(2)(iii). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.

(E) For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.

(ii) Process asbestos-containing waste material into nonfriable forms as follows:
(A) Form all asbestos-containing waste material into nonfriable pellets or other shapes;
(B) Discharge no visible emissions to the outside air from collection and processing operations, including incineration, or use the method specified by 40 CFR 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air.

(iii) For facilities demolished where the RACM is not removed prior to demolition according to 40 CFR 61.145(c)(1) (i), (ii), (iii), and (iv) or for facilities demolished according to 40 CFR 61.145(c)(9), adequately wet asbestos-containing waste material at all times after demolition and keep wet during handling and loading for transport to a disposal site. Asbestos-containing waste materials covered by this paragraph do not have to be sealed in leak-tight containers or wrapping but may be transported and disposed of in bulk.

(iv) Use an alternative emission control and waste treatment method that has received prior approval by the Administrator according to the procedure described in 40 CFR 61.149(c)(2).

(v) As applied to demolition and renovation, the requirements of paragraph (1) of this section do not apply to Category I nonfriable ACM waste and Category II nonfriable ACM waste that did not become crumbled, pulverized, or reduced to powder.

(2) All asbestos-containing waste material shall be deposited as soon as is practical by the waste generator at:
(i) A waste disposal site operated in accordance with the provisions of 40 CFR 61.154, or
(ii) An EPA-approved site that converts RACM and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of 40 CFR 61.155.
(iv) The requirements of paragraph (2) of this section do not apply to Category I nonfriable ACM that is not RACM.

(3) Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 40 CFR 61.149(d)(1) (i), (ii), and (iii).

(4) For all asbestos-containing waste material transported off the facility site:
(i) Maintain waste shipment records, using a form similar to that shown in Figure 4, and include the following information:
(A) The name, address, and telephone number of the waste generator.
(B) The name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program.
(C) The approximate quantity in cubic meters (cubic yards).
(D) The name and telephone number of the disposal site operator.
(E) The name and physical site location of the disposal site.
(F) The date transported.
(G) The name, address, and telephone number of the transporter(s).

(H) A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

(ii) Provide a copy of the waste shipment record, described in paragraph (4)(i) of this section, to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.

(iii) For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.

(iv) Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. Include in the report the following information:

(A) A copy of the waste shipment record for which a confirmation of delivery was not received, and

(B) A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.

(v) Retain a copy of all waste shipment records, including a copy of the waste shipment record signed by the owner or operator of the designated waste disposal site, for at least 2 years.

(5) Furnish upon request, and make available for inspection by the Administrator, all records required under this section.

(i) Meeting the requirements of Section 61.152 (Air Cleaning) and 61.153 (Reporting).
40 CFR 61.152 (Air-cleaning)

(1) The owner or operator who uses air cleaning, as specified in 40 CFR 61.142(a), 40 CFR 61.144(b)(2), 40 CFR 61.145(c)(3)(i)(B)(1), 40 CFR 61.145(c)(4)(ii), 40 CFR 61.145(c)(11)(i), 40 CFR 61.146(b)(2), 40 CFR 61.147(b)(2), 40 CFR 61.149(b), 40 CFR 61.149(c)(1)(ii), 40 CFR 61.150(a)(1)(ii), 40 CFR 61.150(a)(2)(ii), and 40 CFR 61.155(e) shall:

(i) Use fabric filter collection devices, except as noted in paragraph (ii) of this section, doing all of the following:

(A) Ensuring that the airflow permeability, as determined by ASTM Method D737-75, does not exceed 9 m3/min/m2 (30 ft3/min/ft2) for woven fabrics or 113/min/m2(35 ft3/min/ft2) for felted fabrics, except that 12 m3/min/m2 (40 ft3min/ft2) for woven and 14 m3/min/m2 (45 ft 3min/ft2) for felted fabrics is allowed for filtering air from asbestos ore dryers; and

(B) Ensuring that felted fabric weighs at least 475 grams per square meter (14 ounces per square yard) and is at least 1.6 millimeters (one-sixteenth inch) thick throughout; and

(C) Avoiding the use of synthetic fabrics that contain fill yarn other than that which is spun.

(ii) Properly install, use, operate, and maintain all air-cleaning equipment authorized by this section. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material.
(iii) For fabric filter collection devices installed after January 10, 1989, provide for easy inspection for faulty bags.

(2) There are the following exceptions to paragraph (i)(A):
(i) After January 10, 1989, if the use of fabric creates a fire or explosion hazard, or the Administrator determines that a fabric filter is not feasible, the Administrator may authorize as a substitute the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals (40 inches water gage pressure).
(ii) Use a HEPA filter that is certified to be at least 99.97 percent efficient for 0.3 micron particles.
(iii) The Administrator may authorize the use of filtering equipment other than described in paragraphs (i)(A) and (2)(i) and (ii) of this section if the owner or operator demonstrates to the Administrator's satisfaction that it is equivalent to the described equipment in filtering particulate asbestos material.

40 CFR 61.153 (Reporting)

(1) Any new source to which this subpart applies (with the exception of sources subject to 40 CFR 61.143, 40 CFR 61.145, 40 CFR 61.146, and 40 CFR 61.148), which has an initial startup date preceding the effective date of this revision, shall provide the following information to the Administrator postmarked or delivered within 90 days of the effective date. In the case of a new source that does not have an initial startup date preceding the effective date, the information shall be provided, postmarked or delivered, within 90 days of the initial startup date. Any owner or operator of an existing source shall provide the following information to the Administrator within 90 days of the effective date of this subpart unless the owner or operator of the existing source has previously provided this information to the Administrator. Any changes in the information provided by any existing source shall be provided to the Administrator, postmarked or delivered, within 30 days after the change.
(i) A description of the emission control equipment used for each process; and
(A) If the fabric device uses a woven fabric, the airflow permeability in m3/min/m2 and; if the fabric is synthetic, whether the fill yarn is spun or not spun; and
(B) If the fabric filter device uses a felted fabric, the density in g/m2, the minimum thickness in inches, and the airflow permeability in m3/min/m2.
(ii) If a fabric filter device is used to control emissions,
(A) The airflow permeability in m3/min/m2 (ft3/min/ft2) if the fabric filter device uses a woven fabric, and, if the fabric is synthetic, whether the fill yarn is spun or not spun; and
(B) If the fabric filter device uses a felted fabric, the density in g/m2 (oz/yd2), the minimum thickness in millimeters (inches), and the airflow permeability in m3/min/m2 (ft3/min/ft2).
(iii) If a HEPA filter is used to control emissions, the certified efficiency.
(iv) For sources subject to 40 CFR 61.149 and 40 CFR 61.150:
(A) A brief description of each process that generates asbestos-containing waste material; and

(B) The average volume of asbestos-containing waste material disposed of, measured in m3/day (yd3/day); and
(C) The emission control methods used in all stages of waste disposal; and
(D) The type of disposal site or incineration site used for ultimate disposal, the name of the site operator, and the name and location of the disposal site.

(v) For sources subject to 40 CFR 61.151 and 40 CFR 61.154:
(A) A brief description of the site; and
(B) The method or methods used to comply with the standard, or alternative procedures to be used.

(2) The information required by paragraph (1) of this section must accompany the information required by 40 CFR 61.10. Active waste disposal sites subject to 40 CFR 61.154 shall also comply with this provision. Roadways, demolition and renovation, spraying, and insulating materials are exempted from the requirements of 40 CFR 61.10(a). The information described in this section must be reported using the format of appendix A of this part as a guide.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

Pursuant to CP 059-2477-00012, issued on August 26, 1992 and CP 059-2668-00012, issued on October 21, 1992, the baghouses for PM control shall be in operation at all times when the two (2) Pangborn shot blasting systems, the four (4) grinders, and the three (3) deliner choppers are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the two (2) Pangborn shot blasting system, four (4) grinder, and three (3) deliner choppers stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the two (2) Pangborn shot blasting systems, four (4) grinders, and three (3) deliner choppers, at least once weekly when the two (2) Pangborn shot blasting systems, four (4) grinders, and three (3) deliner choppers are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.8 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the two (2) Pangborn shot blasting systems, four (4) grinders, and three (3) deliner choppers. All defective bags shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the two (2) Pangborn shot blasting system, four (4) grinders, and three (3) deliner choppers stack exhaust.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation

when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	D & D Brake Sales, Inc.
Source Location:	State Road 234 and Mohawk Road, Fortville, Indiana 46040
County:	Hancock
SIC Code:	3069, 7539
Operation Permit No.:	T059-9982-00012
Operation Permit Issuance Date:	June 26, 2000
Source Modification No.:	059-12475-00012
Permit Reviewer:	Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed a modification application from D & D Brake Sales, Inc. relating to the operation of a modification to a brake shoe manufacturing facility.

History

On July 10, 2000, D & D Brake Sales, Inc. submitted an application to the OAM requesting to clarify the description of emission units at their existing plant. D & D Brake Sales, Inc. was issued a Part 70 permit on June 26, 2000. This Part 70 permit lists only one deliner chopper with a maximum capacity of 1,875 brakes shoes per hour, controlled by baghouse #3, and based the emissions for this deliner chopper on the grain loading for baghouse #3. This minor source modification corrects the unit description to state that there are three, not one, deliner choppers each with a maximum capacity of 1,875 brake shoes per hour, exhausting to baghouse #3. All three deliner choppers were installed at the source in 1992. The emission calculations were based on the outlet grain loading for baghouse #3 and will not be changed by this modification.

Emission Units and Pollution Control Equipment

The source consists of the addition of the following emission units and pollution control devices:

(a) Two (2) deliner choppers, constructed in 1992, each with a maximum throughput capacity of 1,875 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3. The two (2) deliner choppers and the existing permitted deliner chopper will exhaust to the same baghouse (ID#3).

Existing Approvals

The source was issued a Part 70 Operating Permit (T059-9982-00012) on June 26, 2000. This is the first modification to the Part 70 Operating Permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 10, 2000.

Emission Calculations

No calculations were necessary for this modification.

Potential To Emit Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO_2	less than 100
VOC	less than 100
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Formaldehyde	less than 10
Phenol	less than 10
TOTAL	less than 25

Justification for Modification

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(6), a modification that is subject to a reasonably available control technology (RACT), a new source performance standard (NSPS), or a national emission standard for hazardous air pollutants (NESHAP) and the RACT, NSPS, or NESHAP is the most stringent applicable requirement, except for those modifications that would be subject to the provisions of 40 CFR 63, Subpart B (61 FR 68384) December 27, 1996, Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources.

County Attainment Status

The source is located in Hancock County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Hancock County has been designated as attainment or unclassifiable for ozone.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	99.09
PM-10	10.71
SO_2	0.01
VOC	34.92
CO	0.20
NOx	1.51

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Part 70 Operating Permit (T059-9982-00012) issued to the source on June 26, 2000.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14-2-1, (40 CFR 61.140, Subpart M) because the lining of the brake shoes are made of asbestos. The following requirements of this subpart shall be met:

(1) Each owner or operator shall discharge no visible emissions to the outside air from these operations or from any building or structure in which they are conducted.

(2) Monitoring each potential source of asbestos emissions from visible emissions at least once a day.

(3) Inspecting each air cleaning device at least once each week for proper operation.

(4) Maintaining records of monitoring and inspections using a format similar to Figure 1 and 2 in 40 CFR 61.140, Subpart M.

(5) Furnishing upon request and/or making available the records for inspection by OAM.

(6) Retaining a copy of all monitoring and inspection records for at least two years.

(7) Submitting a copy of the monitoring records if visible emissions occurred during the report period.

(8) Meeting the waste disposal requirements.

(9) Meeting the requirements of Section 61.152 (Air Cleaning) and 61.153 (Reporting).

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

326 IAC 2-4.1-1 applies to new or reconstructed facilities with potential emissions of any single HAP equal or greater than ten (10) tons per twelve (12) month period and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per twelve (12) month period. Since the modification has the potential to emit any single HAP a combination of HAPs less than 10 tons and less than 25 tons per twelve (12) month period, respectively, the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the three (3) deliner choppers shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

UNIT	Process Weight Rate (tons per hour)	Allowable Emissions (pounds per hour)	Controlled Emissions (pounds per hour)
Deliner chopper	0.70	3.23	0.42
Deliner chopper	0.70	3.23	0.42
Deliner chopper	0.70	3.23	0.42

The baghouses shall be in operation at all times the three (3) deliner choppers are in operation, in order to comply with this limit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to the three (3) deliner choppers are as follows:

(a) Daily visible emission notations of the three (3) deliner choppers stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected

to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the three (3) deliner choppers, at least once weekly when the three (3) deliner choppers are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(c) An inspection shall be performed each calender quarter of all bags controlling the three (3) deliner choppers. All defective bags shall be replaced.

(d) In the event that bag failure has been observed the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Changes Proposed

The following changes have been made to the Part 70 Permit with the approval of the OAM Air Compliance Section:

The emission unit description in Sections A.2 and D.2, has been revised as follows:

(c) ~~One (1)~~**Three (3)** deliner choppe**r**s, constructed in 1992, **each** with a maximum throughput capacity of 1,875 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3;

Condition D.2.1, Particulate Matter (PM) [326 IAC 6-3] has been revised as follows:

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from **each of** the **three (3)** deliner choppe**r**s shall not exceed 3.93 pounds per hour when operating at a process weight rate of 1,875 pounds per hour.

Condition D.2.5, Particulate Matter (PM) has been revised as follows:

Pursuant to CP 059-2477-00012, issued on August 26, 1992 and CP 059-2668-00012, issued on October 21, 1992, the baghouses for PM control shall be in operation at all times when the two (2) Pangborn shot blasting systems, the four (4) grinders, and the **three (3)** deliner chopper**s** are in operation.

Condition D.2.6, Visible Emissions Notations has been revised as follows:

(a) Daily visible emission notations of the two (2) Pangborn shot blasting system, four (4) grinder, and **three (3)** deliner chopper**s** stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Condition D.2.7, Parametric Monitoring has been revised as follows:

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the two (2) Pangborn shot blasting systems, four (4) grinders, and **three (3)** deliner chopper**s**, at least once weekly when the two (2) Pangborn shot blasting systems, four (4) grinders, and **three (3)** deliner chopper**s** are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

Condition D.2.8, Baghouse Inspections has been revised as follows:

An inspection shall be performed each calender quarter of all bags controlling the two (2) Pangborn shot blasting systems, four (4) grinders, and **three (3)** deliner chopper**s**. All defective bags shall be replaced.

Condition D.2.10, Record Keeping Requirements has been revised as follows:

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the two (2) Pangborn shot blasting system, four (4) grinders, and **three (3)** deliner chopper**s** stack exhaust.

Conclusion

The operation of this modification to a brake shoe manufacturing facility shall be subject to the conditions of the attached proposed Minor Source Modification No. 059-12475-00012.